

Remarks

This Application has been carefully reviewed in light of the Office Action mailed August 5, 2003. All pending Claims 1-4, 6-11, 13-21, 23-28 and 30-43 stand rejected. Although Applicant believes all pending claims are allowable without amendment, Claims 1, 18, 32, 33 and 43 have been amended to clarify certain distinctions over the prior art that are already present in the claims. Applicant respectfully requests reconsideration and favorable action in this case.

Applicant's Claims are Allowable over *Mukhopadhyay*

The Examiner rejects Claims 1-3, 7-9, 13-16, 18-20, 24-26, 30, 32-34, 36-38, 41 and 43 under 35 U.S.C. § 102(e) as being anticipated by U.S. Patent No. 6,032,158 to Mukhopadhyay et al. ("*Mukhopadhyay*"). Applicant respectfully disagree.

Independent Claim 1 of the present application, as amended, recites in part:

a change retrieval engine . . . operable to:
determine that data in the database managed by the data management system has been changed;
receive information from the data management system identifying a particular business object with which the changed data is associated;
access a data model specifying, for each of a plurality of business objects maintained by the data management system, the plurality of business objects including the particular business object, references to one or more tables managed by the data management system that include data related to the business object;
identify according to the data model the tables specified for the particular business object to identify data to be retrieved from the database using the data management system according to the received information . . .
and
a change transfer engine coupled to the change retrieval engine and operable to . . . communicate the data to an external system distinct from the data management system.

Independent Claims 18, 32, 33 and 43, as amended, recite substantially similar limitations. *Mukhopadhyay* does not disclose, teach, or suggest at least these limitations,

whether *Mukhopadhyay* is considered alone or in combination with any other cited reference or with information generally available to those of ordinary skill in the art at the time the invention was made, for at least the reasons discussed below.

For example, *Mukhopadhyay* fails to disclose, teach or suggest an engine operable to “access a data model specifying, for each of a plurality of business objects maintained by the data management system, the plurality of business objects including the particular business object, references to one or more tables managed by the data management system that include data related to the business object,” as recited in Claim 1.

Mukhopadhyay discloses a system for propagating changes in data stored in source tables of an operational database 102 to target tables of external data marts 106 (or 206-209). A client creates a repository 103, which keeps track of session information as well as mapping information regarding how data is to be mapped from source tables of operational databases 102 to target tables of external data marts 106. (column 3, lines 47-52). The Examiner attempts to equate the “target tables” disclosed in *Mukhopadhyay* with the “business objects” recited in Claim 1. (Office Action, page 3). The Examiner further attempts to equate *Mukhopadhyay*’s disclosed “operational database 102” with “the database managed by the data management system” recited in Claim 1 (Office Action, page 3), and *Mukhopadhyay*’s disclosed “data marts” with the “external system” recited in Claim 1. (Office Action, page 4).

Assuming for the sake of argument that the “target tables” and “data marts” of *Mukhopadhyay* could be equated with the “business objects” and “external system” of Claim 1, respectively, *Mukhopadhyay* would disclose that business objects are maintained by a distinct external system, rather than by the data management system that manages operational database 102. Thus, again assuming for the sake of argument that the Examiner’s attempts to equate elements disclosed in *Mukhopadhyay* with those recited in Claim 1 were valid, the repository 103 disclosed in *Mukhopadhyay* would still merely maintain mapping information between source tables managed by a data management system and a plurality of business objects maintained by a distinct external system. *Mukhopadhyay* fails to disclose, teach or suggest a “plurality of business objects maintained by the data management system” (which,

according to amended Claim 1, is “distinct from” the external system), much less “a data model specifying, for each of a plurality of business objects maintained by the data management system, the plurality of business objects including the particular business object, references to one or more tables managed by the data management system that include data related to the business object,” as recited in Claim 1.

Moreover, the Examiner’s attempt to equate the “target tables” disclosed in *Mukhopadhyay* with the “business objects” recited in Claim 1 is improper. Claim 1 recites a system for receiving information identifying a business object maintained by a data management system, using a data model that specifies tables that include data related to the business object in order to identify data to be retrieved, and communicating the retrieved data to a distinct external system. In contrast, assuming for the sake of argument that the Examiner’s attempts to equate elements disclosed in *Mukhopadhyay* with those recited in Claim 1 were valid, *Mukhopadhyay* would disclose a system for using mapping information stored in a repository 103 in order to propagate data from source tables into the business objects (“target tables”) themselves, which are maintained by an external system.

As another example, *Mukhopadhyay* fails to disclose, teach or suggest an engine operable to “receive information from the data management system identifying a particular business object with which the changed data is associated,” as recited in Claim 1. According to the Examiner, this limitation is disclosed in *Mukhopadhyay* at column 2, lines 26-29 and column 10, lines 29-31. (Office Action, page 3). However, column 2, lines 26-29 merely discloses a system for “capturing and propagating changes made upon the source tables of an operational database to one or more target tables of data marts.” Column 10, lines 29-31 merely discloses that “[t]hree target tables are shown as ITEMS table 810, PRICES table 811, and SALES REVENUE table 812,” which the Examiner attempts to equate with the “business object” recited in Claim 1. Nowhere does this identified text, nor the remainder of *Mukhopadhyay*, disclose “receiv[ing] information from the data management system identifying a particular business object with which the changed data is associated,” as recited in Claim 1.

For at least the reasons discussed above, Applicant respectfully requests reconsideration and allowance of amended Claim 1, together with all claims that depend therefrom. In addition, for at least the reasons stated with regard to Claim 1, Applicant respectfully requests reconsideration and allowance of amended independent Claims 18, 32, 33 and 43, together with all claims that depend therefrom.

Conclusion

Applicant respectfully submits that the present Application is in condition for allowance and favorable notice thereof is requested.

If the Examiner believes a telephone conference would advance prosecution of this Application in any manner, the Examiner is invited to contact Christopher W. Kennerly, Attorney for Applicant, at the Examiner's convenience at (214) 953-6812.

Although no fees are believed due, the Commissioner is hereby authorized to charge any fees or credit any overpayments to Deposit Account No. 02-0384 of Baker Botts L.L.P.

Respectfully submitted,

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Date: November 5, 2003

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